1 PURPOSE

The BP MC 252 Event Sampling Safety Procedures are designed to establish guidelines for the safe but efficient sampling of materials of materials, wastes, or other substances that are to be collected and transported or processed after laboratory analysis.

The procedures herein will not be a discussion of techniques of sampling with all methods and sampling instruments, but rather guidelines for the safe collection, decontamination, transport, and storage of the samples. The personal safety of the sampler is foremost.

2 SCOPE

The BP MC 252 Sampling Safety Procedures and requirements apply to all personnel and all contractor and subcontractor personnel working at all BP MC 252 Event Staging Locations

3 REFERENCES

Heritage Field Services Sampling Program,
29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response".

4 RESPONSIBILITY

The Project Manager or his/her designee shall be responsible to ensure that these procedures and requirements are met in their divisions as to sample collection, handling, and storage. In addition, he or she shall see that samples are properly stored and disposed of appropriately and in a timely manner.

5 PROCEDURES FOR SAMPLING SAFETY

5.1 Prior to sampling, supervisors shall ensure that Safety Plans are completed and approved. The Safety Plan or procedure shall be on-site.

5.2 In operations where the main scope of work is the sampling of known materials, or for obtaining samples for analysis and processing, the following requirements should normally be followed:

5.3 A minimum of 2 persons shall work the area where one shall always be in the safety zone available and able to obtain assistance in an emergency.

5.4 When appropriate, safety equipment should be available and within the immediate area of personnel containing the following minimum safety equipment or easily accessible:

a) Fire extinguisher (immediate area)
b) First Aid Kit (on site)
c) Latex or Vinyl gloves
d) Oil absorbent pads/oil dry (immediate area)
e) Shovel and broom (immediate area)
f) Eye wash (immediate area)
g) Cell phone (immediate area)

5.5 Normally, most sampling will be done at Level D protection. However, based on the type of waste stream and expected material, an upgrade or down grade may be allowed according to the waste stream's required safety equipment.

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6 Roll-off Box Sampling:

6.1 Do not enter the roll-off, use a ladder to grab bags from each quadrant.
6.2 Bagged waste material will be removed from each of the selected containers and the contents of the bags will be laid out on plastic sheeting.
6.3 A representative aliquot of each type of waste material (oiled sorbent boom, oiled sorbent pads, oiled PPE, etc) will be collected.
6.4 Waste material will be cut, using shears or scissors, into manageable pieces of approximately 1 to 2 square inches, or as small as practical in the field, then placed into a dedicated pan, thoroughly mixed, then transferred to an approved sample container. Further particle size reduction may be required at the laboratory.
6.5 Sample material will be tightly packed inside sample containers.
6.6 Label sample containers
6.7 Tag out roll-off. Don't add to or remove any materials or ship off-site until results are reviewed.
6.8 All other sampling procedures shall be in accordance with generally acceptable best-demonstrated safety practices.

7 Liquid Waste Sampling

7.1 Use non-sparking tools made of non-sparking materials.
7.2 Allow all pressure to release once the seal is broken. It is a good idea to place absorbent pads around opening before breaking the seal in case contents leak when opened.
7.3 Step away until all pressure is released.
7.4 Have sample container immediately near the opening to minimize dripping and creating a mess.
7.5 Liquid waste samples will be collected from bulk containers (barges or frac tanks) using a drum thief sampler, Composite Liquid Waste Sampler (COLIWASA), or similar device. A separate sample will be collected for the oil and aqueous phases, as appropriate, and transferred to an approved sample container.
7.6 All other sampling procedures shall be in accordance with generally acceptable best-demonstrated safety practices.

8 HANDLING AND STORAGE OF SAMPLES

8.1 Samples are not to be brought into, prepared, or kept in the offices or office trailers.
8.2 All samples must be marked with a label which includes the following:
a) Sampler's Name
b) BP MC 252 Event and Location
c) Sample Date
d) Sample Type (oil and water, oily debris)
e) Sample Number
f) Unique sample identification number to match the container including the roll-off number or frac tank number and the accumulation start date.

9 SAMPLE PRESERVATION AND HOLD TIMES

9.1 Samplers will obtain and use single use sample containers for the samples collected during the sampling effort.
9.2 Laboratory samples will be stored in coolers with ice until they are submitted for analysis.
9.3 Request expedited turnaround time for waste analytical results unless otherwise advised based on discussions with the laboratory.
9.4 Samples that have been analyzed will be disposed by the designated laboratory in accordance with the laboratory SOPs.

10 Sample Shipment

10.1 The samples will be preserved and packaged in coolers with ice according to appropriate sample packing guidelines. In general, the samples will be shipped via carrier to the participating laboratories by the Department of Transportation (DOT) regulations governing environmental and hazardous sample packaging, labeling and sampling will be followed.
10.2 A separate chain-of-custody (COC) record will be completed for each sample cooler that is prepared for shipment to the laboratory.
10.3 COC forms will be filled out and the original signed COC forms will be inserted in a sealable plastic bag and placed inside the cooler. A copy of this record will remain with the shipped samples at all times.
10.4 The cooler lids will be securely taped shut, a custody seal applied, and then delivered to shipping company, courier, or directly to the analytical laboratories.

11 SAMPLE SUMISSION

11.1 Samples will be submitted to a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory for the following analyses:

a) Toxicity Characteristic Leaching Procedure Volatiles (TCLP VOCs) by SW-846 Method 1311/8260B.
b) TCLP Resource Conservation and Recovery Act (RCRA) List Metals by SW-846 Method 1311/6010C and Method 1311/7470.
c) Ignitability by SW846 Method 1010/1020